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Counsel for Petitioner

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MAHMOUD KHALIL,

Petitioner,

v.

WILLIAM JOYCE ET AL.,

Respondent.

Case No. 2:25-cv-01963
(MEF)(MAH)

**CERTIFICATION OF ESHA
BHANDARI IN SUPPORT OF
APPLICATION FOR ADMISSION
PRO HAC VICE PURSUANT TO
LOCAL CIVIL RULE 101.1**

I, Esha Bhandari, hereby certify the following:

1. I am an attorney at the American Civil Liberties Union Foundation (“ACLU”). I have been requested to represent Petitioner in this matter.

2. I am a member in good standing of the New York State bar as of 2011.

3. I am also admitted to practice before the following courts:

Court	Year of Admission	Attorneys Rolls Maintained By:
New York State Appellate Division, Second Department	2011	Supreme Court, State of New York Appellate Division, Second Department 45 Monroe Place Brooklyn, NY 11201
U.S. Supreme Court	2016	1 First Street, NE Washington, DC 20543
U.S. Court of Appeals for the First Circuit	2020	John Joseph Moakley U.S. Courthouse 1 Courthouse Way, Suite 2500 Boston, MA 02210
U.S. Court of Appeals for the Second Circuit	2012	Thurgood Marshall United States Courthouse

		40 Foley Square New York, New York 10007
U.S. Court of Appeals for the Third Circuit	2012	United States Court of Appeals for the Third Circuit 21400 U.S. Courthouse 601 Market Street Philadelphia, PA 19106-1790
U.S. Court of Appeals for the Fourth Circuit	2017	Lewis F. Powell Jr. Courthouse & Annex 1100 East Main Street, Suite 501 Richmond, VA 23219
U.S. Court of Appeals for the Fifth Circuit	2012 (inactive)	United States Court of Appeals Fifth Circuit Office Of the Clerk F. Edward Hebert Building 600 S. Maestri Place New Orleans, LA 70130-340

U.S. Court of Appeals for the Seventh Circuit	2018	Everett McKinley Dirksen United States Courthouse 219 S. Dearborn Street Room 2722 Chicago, IL 60604
U.S. Court of Appeals for the Eighth Circuit	2012	Thomas F. Eagleton Courthouse 111 South 10th Street Room 24.329 St. Louis, MO. 63102
U.S. Court of Appeals for the Ninth Circuit	2011	The James R. Browning Courthouse 95 7th Street San Francisco, CA 94103
U.S. Court of Appeals for the Eleventh Circuit	2012	Elbert P. Tuttle Courthouse 56 Forsyth Street, N.W. Atlanta, GA 30303
U.S. Court of Appeals for the Federal Circuit	2012	Jarrett B. Perlow 717 Madison Place, NW Washington, DC 20439

U.S. District Court for the Eastern District of New York	2015	United States District Court for the New York Eastern District 225 Cadman Plaza East Brooklyn, NY 11201
U.S. District Court for the Southern District of New York	2012	500 Pearl Street, New York, NY 10007
U.S. District Court for the Western District of Texas	2014	

4. No professional disciplinary proceedings are pending against me in any jurisdiction and no professional discipline has previously been imposed on me in any jurisdiction.

5. In the event I am admitted *pro hac vice*, I agree to:

- a. Make payment to the New Jersey Lawyer's Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) for each year in which I represent Petitioner in this matter;
- b. Abide by the Rules of this Court, including any relevant disciplinary rules;
- c. Notify this Court immediately of any matters affecting my standing at the Bar of any other Court; and

- d. Have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in the United States District Court for the District of New Jersey.
6. In view of the foregoing, I respectfully request that I be admitted *pro hac vice*.

Pursuant to 28 U.S.C. § 1746, I affirm under penalty of perjury that the above statements are true and correct.

Dated: March 21, 2025

Respectfully Submitted,
/s/Esha Bhandari
Esha Bhandari
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